

Message

From: Simon, Karl [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=4D781D1AD595415DB3A4E768C2D2B3FC-SIMON, KARL]
Sent: 3/22/2021 7:42:17 PM
To: Pat Quinn [pquinn@theaccordgroup.com]
Subject: RE: Auto Suppliers Meeting Request

Not really. We focus on the "technical feasibility" part of title 2, section 202. That language is pretty broad in that it allows EPA to make technical determinations differently than our stationary source colleagues. Lastly, setting performance standards resolves a lot of these technology differentiation concerns. Hope this helps.

From: Pat Quinn <pquinn@theaccordgroup.com>
Sent: Monday, March 22, 2021 3:35 PM
To: Simon, Karl <Simon.Karl@epa.gov>
Subject: RE: Auto Suppliers Meeting Request

One other random question. Do concepts like BAT, MACT, BACT have any legal applicability or meaning in the mobile source space ? I am familiar with their meanings on stationary sources, but we can't argue, for example, that GPFs are BACT for passenger cars....can we ?

From: Simon, Karl <Simon.Karl@epa.gov>
Sent: Thursday, March 4, 2021 12:24 PM
To: Pat Quinn <pquinn@theaccordgroup.com>
Subject: RE: Auto Suppliers Meeting Request

Nothing yet. Seems like notice and comment is the more durable action

From: Pat Quinn <pquinn@theaccordgroup.com>
Sent: Thursday, March 4, 2021 11:57 AM
To: Simon, Karl <Simon.Karl@epa.gov>
Subject: RE: Auto Suppliers Meeting Request

Thanks Karl, any further clarity on how NHTSA will proceed to unwind the EPCA pre-emption legal interpretation ? Will it really require Notice and Comment rulemaking or will a simple re-interpretation by their lawyers be sufficient ?

Pat

From: Simon, Karl <Simon.Karl@epa.gov>
Sent: Thursday, March 4, 2021 9:14 AM
To: Pat Quinn <pquinn@theaccordgroup.com>
Subject: RE: Auto Suppliers Meeting Request

Thanks Pat. I understand your note is being discussed so expect you all will be hearing back from OAR IO shortly.

From: Pat Quinn <pquinn@theaccordgroup.com>
Sent: Thursday, February 25, 2021 10:00 AM
To: Simon, Karl <Simon.Karl@epa.gov>
Subject: Fwd: Auto Suppliers Meeting Request

Karl, really good to catch up. Thanks for your time and advice. Below is my note to Joe; I may also reach out to Alejandra separately.

Stay safe and well, Pat

Sent from my iPhone

Begin forwarded message:

From: Pat Quinn <pquinn@theaccordgroup.com>

Date: February 9, 2021 at 1:29:00 PM EST

To: goffman.joseph@epa.gov

Cc: campbell.ann@epa.gov, rakosnik.delaney@epa.gov, "Dunham, Sarah" <Dunham.Sarah@epa.gov>

Subject: Auto Suppliers Meeting Request

Joe, welcome home! Congratulations on your work so far during the transition and there are certainly a large number of us who are hopeful that you will remain at OAR. I was telling someone the story of how we first met over EDF's advocacy of market based approaches to controlling Acid Rain in 1989 ?..... but it dates us both a bit too much so I'm giving up on that anecdote.

I am writing on behalf of Manufacturer of Emissions Controls Association (MECA) and the Advanced Engine Systems Institute (AESI), two trade associations representing the vast majority of companies that manufacture emission control and efficiency technologies for all mobile sources. Automotive suppliers have become the fastest growing manufacturing sector since 2012 with investments totaling more than \$4 Billion since that time. Suppliers employ more than 870,000 Americans in all 50 states.

Much of the new Administration's early focus has understandably been on reversing the SAFE rule and taking quick action to propose a more stringent replacement. Our member companies strongly support prompt adoption of a national program as soon as possible since vehicle manufacturers are already releasing their 2024 supply contracts and planning their 2025 compliance paths.

MECA and AESI also believe that in the medium and heavy duty space, deep NOx reductions can be achieved simultaneous with fuel economy improvements cost effectively and at a much lower cost per ton of NOx than most stationary source options.

Rasto Brezny is the Executive Director of MECA, and I serve as the Executive Director of AESI, which is a subset of MECA companies. Our two associations focus on the regulatory and policy advocacy side of mobile source air quality issues. We would like to arrange a conversation with you, Sarah and your team that would include senior executives from some of our leading companies about the future regulation of on-road vehicles. Mike Geller, Rasto's Deputy at MECA, and Chris Miller, my colleague assisting with AESI ---both of whom I believe you know --would likely join the conversation. We are hopeful that we might schedule something that works on your calendar quite soon, recognizing that you are likely besieged with such requests at this time.

Thanks Joe in advance for your assistance with this. I look forward to working with you and your staff on the logistics.

Pat Quinn
The Accord Group
Executive Director, AESI
202-841-3930

From: Pat Quinn <pquinn@theaccordgroup.com>
Sent: Thursday, February 4, 2021 11:35 AM
To: Mavian, Kari (K) <KMavian@dow.com>
Subject: FW: Need your help Editing this

This email originated from outside of the organization.

Can you accept Rasto's edits and make first paragraph font consistent and then send back to me ?

From: Pat Quinn
Sent: Wednesday, February 3, 2021 4:27 PM
To: Kari Mavian (karimavian@gmail.com) <karimavian@gmail.com>
Subject: Need your help Editing this

Joe, welcome home ! Congratulations on your work so far during the transition and there are certainly a large number of us who are hopeful that you will remain at OAR. I was telling someone the story of how we first met over EDF's advocacy of market based approaches to controlling Acid Rain in 1989 ?..... but it dates us both a bit too much so I'm giving up on that anecdote.

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Much of the new Administration's early focus has understandably been on reversing the SAFE rule and taking quick action to propose a more stringent replacement. ~~and~~ Our member companies strongly support prompt adoption of a national program as soon as possible since vehicle manufacturers are already releasing their 2024 supply contracts and planning their 2025 compliance paths. Perhaps a voluntary California type agreement with automakers governing passenger cars through MY 2026 offers a quick path to get us to the next set of passenger car CO2 and pollution standards. MECA and AESI also believe that in the medium and heavy duty space, deep NOx reductions can be achieved simultaneous with fuel economy improvements cost effectively and at a much lower cost per ton of NOx than most stationary source options.

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